

ESTTA Tracking number: **ESTTA766945**

Filing date: **08/26/2016**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91215896
Party	Plaintiff Bells Brewery, Inc.
Correspondence Address	SARAH M ROBERTSON DORSEY & WHITNEY LLP 51 W 52ND ST NEW YORK, NY 10019-6119 UNITED STATES ny.trademark@dorsey.com, robertson.sarah@dorsey.com, ewing.bruce@dorsey.com
Submission	Plaintiff's Notice of Reliance
Filer's Name	Sarah M. Robertson
Filer's e-mail	ny.trademark@dorsey.com, robertson.sarah@dorsey.com, pro-goff.susan@dorsey.com, sunderji.fara@dorsey.com
Signature	/smr/
Date	08/26/2016
Attachments	INNOVATION BREWING Notice of Reliance.pdf(12403 bytes) NOR Exhibit 01.pdf(241016 bytes) NOR Exhibit 02.pdf(245706 bytes) NOR Exhibit 03_Redacted.pdf(1432988 bytes) NOR Exhibit 04.pdf(3508007 bytes) NOR Exhibit 05.pdf(3550192 bytes) NOR Exhibit 06.pdf(270539 bytes) NOR Exhibit 07.pdf(282449 bytes) NOR Exhibit 08.pdf(274817 bytes) NOR Exhibit 09.pdf(271168 bytes) NOR Exhibit 10.pdf(269854 bytes) NOR Exhibit 11.pdf(272620 bytes) NOR Exhibit 12.pdf(278249 bytes) NOR Exhibit 13.pdf(278410 bytes) NOR Exhibit 14.pdf(262066 bytes) NOR Exhibit 15.pdf(266992 bytes) NOR Exhibit 16.pdf(261937 bytes) NOR Exhibit 17.pdf(219462 bytes) NOR Exhibit 18.pdf(224273 bytes)

Bell's Brewery, Inc.,

v.

Innovation Brewing,

Applicant.

Opposer, Bell’s Brewery, Inc., (“Bell’s”) hereby provides notice that it intends to rely upon, and hereby submits, the following evidence in support of its case-in-chief:

1. A printout from the Trademark Electronic Search System of Registration No. 3,122,464 of Bell's trademark INSPIRED BREWING in the name of Bell's Brewery, Inc., and a printout of the corresponding record from USPTO Assignments on the Web confirming title in Bell's Brewery, Inc., copies of which are attached as Exhibit 1.
2. A printout from the Trademark Electronic Search System of Registration No. 4,098,319 of Bell's trademark INSPIRED BREWING in the name of Bell's Brewery, Inc., and a printout of the corresponding record from USPTO Assignments on the Web confirming title in Bell's Brewery, Inc., copies of which are attached as Exhibit 2.
3. Applicant Innovation Brewing's responses to Opposer's Interrogatories 8, 11, 12, 13, 14, 16 and 20. Copies of the relevant pages of "Applicant's Third Amended Responses to Opposer's First Set of Interrogatories" are attached as Exhibit 3. Applicant's responses to

Interrogatories 12 and 20 have been marked as TRADE SECRET/COMMERCIALY SENSITIVE and are being filed under seal.

4. A printout from <merriam-webster.com> containing the definition of the word “Inspired” is attached as Exhibit 4. This document is relevant to demonstrating the similarity of the marks at issue.

5. Printout from <merriam-webster.com> containing the definition of the word “Innovation” is attached as Exhibit 5. This document is relevant to demonstrating the similarity of the marks at issue.

6. The following excerpts from the Rule 30(b)(6) Deposition of Innovation Brewing through Nicole Dexter, copies of which are attached as the respective exhibits indicated below.

A description of the relevance of Exhibits 6 through 18 also appears below:

Page 41, line 8 through line 17 – Exhibit 6: Relevant to the similarity of the goods.

Page 41, line 25 through page 43, line 2 – Exhibit 7: Relevant to the length of time during which there has been concurrent use.

Page 66, line 18 through page 67, line 18 – Exhibit 8: Relevant to the length of time during and the conditions under which there has been concurrent use.

Page 88, line 16 through line 21 – Exhibit 9: Relevant to the conditions under which there has been concurrent use.

Page 90, line 13 through line 24 – Exhibit 10: Relevant to the conditions under which there has been concurrent use.

Page 91, line 7 through line 9 – Exhibit 11: Relevant to the conditions under which there has been concurrent use.

Page 100, line 24 through page 101, line 12 – Exhibit 12: Relevant to similarity of use of the marks.

Page 109, line 19 through page 110, line 6 – Exhibit 13: Relevant to the conditions under which there has been concurrent use.

Page 203, line 2 through line 7 – Exhibit 14: Relevant to the conditions under which there has been concurrent use.

Page 209, line 10 through page 212, line 2 – Exhibit 15: Relevant to the similarity of trade channels and promotional channels.

Page 245, line 6 through line 9 – Exhibit 16: Relevant to the similarity of the target purchasers and consumers.

Page 251, line 3 through line 19 – Exhibit 17: Relevant to the extent of potential confusion and relevant to harm.

Page 252, line 10 through page 254, line 20 – Exhibit 18: Relevant to the extent of potential confusion.

Respectfully Submitted,

DORSEY & WHITNEY LLP

Dated: August 26, 2016

By: /smr/

Sarah M. Robertson

Susan Progoff

Fara S. Sunderji

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New York, New York 10019

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Email: ny.trademark@dorsey.com

THE FIRM OF HUESCHEN AND SAGE

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Joanna T. French

Seventh Floor, Kalamazoo Building

107 West Michigan Avenue

Kalamazoo, Michigan

Tel: (269) 382-0030

Attorneys for Opposer,

Bell's Brewery, Inc.

CERTIFICATE OF SERVICE

I hereby certify that on this 26th day of August, 2016, a copy of the foregoing
OPPOSER'S NOTICE OF RELIANCE was served on Applicant via Priority Mail Express to:

Ian D. Gates, Esq.
DASCENZO INTELLECTUAL PROPERTY LAW, P.C.
1000 SW Broadway, Suite 1555
Portland, Oregon 97205

_____/tek/
Thomas Kearney

EXHIBIT 1



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INSPIRED BREWING

Word Mark	INSPIRED BREWING
Goods and Services	IC 032. US 045 046 048. G & S: Beer, porter, ale, stout and malt liquor. FIRST USE: 20031200. FIRST USE IN COMMERCE: 20031200
Standard Characters Claimed	
Mark Drawing Code	(4) STANDARD CHARACTER MARK
Serial Number	76638946
Filing Date	May 19, 2005
Current Basis	1A
Original Filing Basis	1A
Published for Opposition	May 9, 2006
Registration Number	3122464
Registration Date	August 1, 2006
Owner	(REGISTRANT) BELL'S BREWERY, INC. CORPORATION MICHIGAN 8938 KRUM AVENUE GALESBURG MICHIGAN 49053
Assignment Recorded	ASSIGNMENT RECORDED
Attorney of Record	G. Patrick Sage
Disclaimer	NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "BREWING" APART FROM THE MARK AS SHOWN
Type of Mark	TRADEMARK
Register	PRINCIPAL
Affidavit Text	SECT 15. SECT 8 (6-YR). SECTION 8(10-YR) 20160426.
Renewal	1ST RENEWAL 20160426

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Trademark Assignment Abstract of Title

Total Assignments: 2

Serial #: [76638946](#)

Filing Dt: 05/19/2005

Reg #: [3122464](#)

Reg. Dt: 08/01/2006

Registrant: BELL'S BREWERY, INC.

Mark: INSPIRED BREWING

Assignment: 1

Reel/Frame: [3244/0611](#)

Recorded: 10/31/2005

Pages: 4

Conveyance: CHANGE OF NAME

Assignor: [KALAMAZOO BREWING CO., INC.](#)

Exec Dt: 08/07/2005

Entity Type: CORPORATION

Citizenship: MICHIGAN

Entity Type: CORPORATION

Citizenship: MICHIGAN

Assignee: [BELL'S BREWERY, INC.](#)

8938 KRUM AVENUE

GALESBURG, MICHIGAN 49053

Correspondent: HUESCHEN & SAGE PLLC

SEVENTH FLOOR, KALAMAZOO BUILDING

107 WEST MICHIGAN AVENUE

KALAMAZOO, MICHIGAN 49007

Assignment: 2

Reel/Frame: [4630/0817](#)

Recorded: 09/27/2011

Pages: 22

Conveyance: SECURITY INTEREST

Assignor: [BELL'S BREWERY, INC.](#)

Exec Dt: 12/01/2010

Entity Type: CORPORATION

Citizenship: MICHIGAN

Entity Type: NATIONAL BANKING
ASSOCIATION

Citizenship: UNITED STATES

Assignee: [PNC BANK, NATIONAL ASSOCIATION](#)

108 E. MICHIGAN AVENUE

MAIL STOP Z1-B652-01-4

KALAMAZOO, MICHIGAN 49007

Correspondent: MALISHEIA DOUGLAS

BENESCH FRIEDLANDER COPLAN & ARONOFF LLP

200 PUBLIC SQUARE, SUITE 2300

CLEVELAND, OH 44114

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INSPIRED BREWING

**Word Mark
Goods and
Services**

INSPIRED BREWING

IC 016. US 002 005 022 023 029 037 038 050. G & S: Paper goods, namely, posters, stickers, bumper stickers, paper coasters; paper materials and printed matter, namely, posters, stickers, bumper stickers, paper coasters. FIRST USE: 20031201. FIRST USE IN COMMERCE: 20031201

IC 018. US 001 002 003 022 041. G & S: Messenger bags; handbags; purses; wallets; umbrellas; patio umbrellas. FIRST USE: 20070000. FIRST USE IN COMMERCE: 20070000

IC 021. US 002 013 023 029 030 033 040 050. G & S: Beverage glassware; bottle opener; reusable stainless steel water bottles sold empty; reusable plastic water bottles sold empty; insulating sleeve holders for beverage bottles; plastic coasters. FIRST USE: 20031201. FIRST USE IN COMMERCE: 20031201

IC 024. US 042 050. G & S: Beach towels; towels. FIRST USE: 20090000. FIRST USE IN COMMERCE: 20090000

IC 025. US 022 039. G & S: Clothing, namely, shirts, t-shirts, sweatshirts, jackets, jerseys, socks; baseball caps and hats; skull caps; scarves. FIRST USE: 20060000. FIRST USE IN COMMERCE: 20060000

IC 028. US 022 023 038 050. G & S: Discs for playing disc golf; playing cards. FIRST USE: 20070900. FIRST USE IN COMMERCE: 20070900

IC 032. US 045 046 048. G & S: Beer; ale; stout; porter; malt liquor. FIRST USE: 20031201. FIRST USE IN COMMERCE: 20031201

Standard

**Characters
Claimed****Mark Drawing
Code** (4) STANDARD CHARACTER MARK**Serial Number** 85296771**Filing Date** April 15, 2011**Current Basis** 1A**Original Filing
Basis** 1A**Published for
Opposition** November 29, 2011**Registration
Number** **4098319****Registration Date** February 14, 2012**Owner** (REGISTRANT) BELL'S BREWERY, INC. CORPORATION MICHIGAN 8938 Krum Avenue
Galesburg MICHIGAN 49053**Attorney of
Record** G. Patrick SAGE**Prior
Registrations** 3122464**Disclaimer** NO CLAIM IS MADE TO THE EXCLUSIVE RIGHT TO USE "BREWING" APART FROM THE
MARK AS SHOWN**Type of Mark** TRADEMARK**Register** PRINCIPAL**Live/Dead
Indicator** LIVE[TESS HOME](#)[NEW USER](#)[STRUCTURED](#)[FREE FORM](#)[BROWSE DICT](#)[SEARCH OG](#)[TOP](#)[HELP](#)[HOME](#) | [SITE INDEX](#) | [SEARCH](#) | [eBUSINESS](#) | [HELP](#) | [PRIVACY POLICY](#)



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Trademark Assignment Abstract of Title

Total Assignments: 1

Serial #: [85296771](#)

Filing Dt: 04/15/2011

Reg #: [4098319](#)

Reg. Dt: 02/14/2012

Registrant: BELL'S BREWERY, INC.

Mark: INSPIRED BREWING

Assignment: 1

Reel/Frame: [4630/0817](#)

Recorded: 09/27/2011

Pages: 22

Conveyance: SECURITY INTEREST

Assignor: [BELL'S BREWERY, INC.](#)

Exec Dt: 12/01/2010

Entity Type: CORPORATION

Citizenship: MICHIGAN

Entity Type: NATIONAL BANKING
ASSOCIATION

Citizenship: UNITED STATES

Assignee: [PNC BANK, NATIONAL ASSOCIATION](#)

108 E. MICHIGAN AVENUE

MAIL STOP Z1-B652-01-4

KALAMAZOO, MICHIGAN 49007

Correspondent: MALISHEIA DOUGLAS

BENESCH FRIEDLANDER COPLAN & ARONOFF LLP

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EXHIBIT 3

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

BELL'S BREWERY, INC.,)	
)	
Opposer,)	
)	
v.)	Opposition No. 91215896
)	
INNOVATION BREWING,)	
Applicant.)	
_____)	

Applicant's Third Amended Responses to Opposer's First Set of Interrogatories

Applicant Innovation Brewing, for its answers and objections to Opposer Bell's Brewery, Inc.'s First Set of Interrogatories, responds as set forth below.

GENERAL OBJECTIONS

1. Applicant responds to each Interrogatory subject to the general objections set forth herein. These limitations and objections form a part of the answer to each Interrogatory. These limitations and objections may be specifically referred to in an answer to one or more individual Interrogatories for the purpose of clarity. The failure to specifically incorporate a general objection, however, is not a waiver of such objection.

2. Applicant objects to the Interrogatories to the extent that they purport to impose

obligations or actions beyond those required by the Rules of Practice in Trademark Cases (i.e., 37 C.F.R. Part 2), the Trademark Trial and Appeal Board Manual of Procedure ("TBMP"), and the Federal Rules of Civil Procedure. Applicant responds to the Interrogatories only to the extent required thereby and subject to the objection that the Interrogatories purport to impose any obligations that differ from, exceed, or conflict with those set forth in the Rules of Practice in Trademark Cases, the TBMP, and the Federal Rules of Civil Procedure.

3. Applicant objects to the definition of "Applicant" presented in Applicant's First Set of Interrogatories as vague and ambiguous, and overly broad and unduly burdensome. For its answers and objections, Applicant takes the term "Applicant" to mean Innovation Brewing, LLC.

4. Applicant objects to the Interrogatories to the extent they call for information protected by the attorney-client privilege, the work product doctrine, or any other applicable claim, law, or rule of privilege or immunity. Although Applicant's responses exclude any and all confidential information, Applicant will exchange privilege and redaction logs with Opposer, if required by the Federal Rules of Civil Procedure, in due course.

5. In making these objections and providing these responses, Applicant does not waive or intend to waive (a) any objection as to competency, relevancy, materiality, or admissibility of any information that may be produced or disclosed in response to the Interrogatories; (b) any right to object on any ground to the use of any information that may be produced or disclosed in response to the Interrogatories, or the subject matter thereof, at any subsequent proceeding, including during the testimony periods for this or any other action; and (c) any right to object on any ground to any Interrogatories or any other discovery request.

6. Applicant reserves the right to amend or supplement its responses as additional

information is learned during further investigation and discovery.

Subject to and without waiving the foregoing, Applicant responds to the Interrogatories as follows:

Interrogatory No. 8:

Identify, by generic name, each of Applicant's Identified Goods and any other product or service that Applicant is marketing, manufacturing, distributing or selling, or intends to market, manufacture, distribute or sell, under Applicant's Mark (each, a "Product," collectively, the "Products").

Response No. 8:

beer, apparel, glassware, insulated beverage sleeves, stickers, brew pub services, retail sale of beer, and wholesale sale of beer.

Interrogatory No. 11:

State the date on which Applicant first offered each Product for sale or, if not yet offered for sale, the date on which Applicant intends to offer each such Product for sale.

Response No. 11:

Applicant objects to this Interrogatory as irrelevant to the sole issue of likelihood of confusion; however, in an effort to avoid an unnecessary dispute regarding this Interrogatory, Applicant responds as follows:

Beer – October 18, 2013

Apparel – October 18, 2013

Glassware – October 18, 2013

Insulated beverage sleeves – October 18, 2013

Stickers – October 18, 2013

Brew pub services – October 18, 2013

Retail sale of beer – October 18, 2013

Wholesale sale of beer – September 2, 2014

Interrogatory No. 12:

State the volume of sales for each Product, if any, by dollar and unit, since inception.

Response No. 12:

Applicant objects to this Interrogatory as irrelevant to the sole issue of likelihood of confusion; however, in an effort to avoid an unnecessary dispute regarding this Interrogatory, Applicant responds as follows with the understanding that this information is designated **TRADE**

SECRET/COMMERCIALY SENSITIVE:

REDACTED - FILED UNDER SEAL

Interrogatory No. 13:

State the retail and wholesale prices at which each Product is currently sold and/or is intended to be sold by Applicant.

Response No. 13:

Applicant objects to this Interrogatory as irrelevant to the sole issue of likelihood of confusion; however, in an effort to avoid an unnecessary dispute regarding this Interrogatory, Applicant responds as follows:

Pints – \$3 - \$8

Half Pint – \$2.50 - \$5

Samples – \$1.75 - \$3

Flights – \$8 - \$10

Growlers – \$10 - \$40

1/2 Growlers – \$5 - \$25

1/6 Kegs – \$65 - \$150

1/2 Kegs – \$170 - \$300

Apparel – \$12 - \$50

Glassware – \$3 - \$6

Other merchandise – \$1 - \$20

Interrogatory No. 14:

Identify the actual or intended class(es) of purchasers for the Products.

Response No. 14:

Applicant objects to this Interrogatory as vague and overly broad; however, in an effort to avoid an unnecessary dispute regarding this Interrogatory, Applicant responds as follows:

Beer drinkers, beer enthusiasts, bars, and restaurants.

Interrogatory No. 16:

Identify the actual or intended trade channels for the Products.

Response No. 16:

Applicant sells its products on its premises to retail customers and sells wholesale to restaurants and bars with Applicant acting as its own distributor.

Interrogatory No. 20:

State the annual dollar amounts, if any, expended by Applicant, or proposed to be expended by Applicant, in advertising and promoting the Products, since inception.

Response No. 20:

Applicant objects to this Interrogatory as irrelevant to the sole issue of likelihood of confusion; however, in an effort to avoid an unnecessary dispute regarding this Interrogatory,

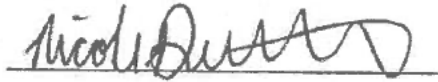
Applicant responds as follows with the understanding that this information is designated TRADE

SECRET/COMMERCIALY SENSITIVE:

REDACTED - FILED UNDER SEAL

Verification

I, Nicole Dexter, declare under penalty of perjury, under the laws of the United States that I have read the foregoing Applicant's Third Amended Responses to Opposer's First Set of Interrogatories, know the contents thereof, and believe that the same are true based on my personal knowledge, information supplied to me, and the books, records, and documents maintained by Innovation Brewing, LLC.

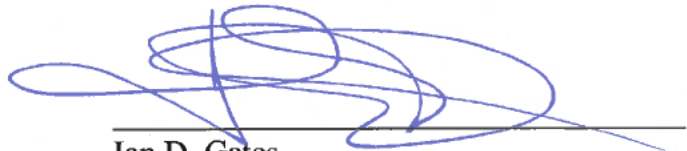


Nicole Dexter

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing Applicant's Third Amended Responses to Opposer's First Set of Interrogatories is being served on Opposer by First Class Mail on April 24, 2015 to:

Sarah M. Robertson
Dorsey & Whitney LLP
51 West 52nd Street
New York, NY 10019-6119



Ian D. Gates
Of Attorneys for Applicant

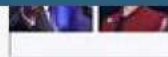
EXHIBIT 4



SINCE 1828

MENU

inspired



2016 presidential campaign

VOCABULARY?

to find



Totally transformed.
Adobe Creative Cloud. The entire collection of apps & services starting at us\$49.99/mo. [Join now >](#)

inspired

adjective

Simple Definition of INSPIRED

Popularity: Bottom 50% of words

: very good or clever

: having a particular cause or influence

Full Definition of INSPIRED

: outstanding or brilliant in a way or to a degree suggestive of divine **inspiration** <gave an *inspired* performance>

See **inspired** defined for English-language learners

WORD OF THE DAY

FEBRUARY 17, 2016

nimrod

a hunter or an idiot or jerk

Get Word of the Day daily email!

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MOVE AHEAD

BROWSE DICTIONARY

Examples of INSPIRED

She gave an *inspired* performance.

He was an *inspired* choice for the role.

HIRED

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Access, Quality, & Intent

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First Known Use of INSPIRED

15th century

Rhymes with INSPIRED

retired

Learn More about INSPIRED

English: [Translation of "inspired" for Spanish speakers](#)

inspection arms

inspection car

inspector

inspectorate

inspector general



TRENDING NOW

1 Evitable

When 'inevitable' isn't

2 Malleable

Lookups for the word spiked after Ca...

3 Litmus Test

Once a chemistry term, now used inc...

4 Amnesty

Everyone's looking for 'amnesty'. Again.

5 Mano a Mano

Cruz challenged Trump to a 1-on-1 d...

Britannica English: Translation of "inspired" for Arabic speakers



Seen and Heard

What made you want to look up inspired? where you read or heard it (including the possible).

15 Comments



Take a skills!



Virginia Kropas

How much does a batman (the Turkish unit of measurement) weigh?

100 pounds

2 2 pounds

1



10 quick questions: hear them, spell them, and see how your skills compare to the crowd.

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Test Your Knowledge - and learn some interesting things along the way.

TAKE THE QUIZ >

WORDS AT PLAY



Deprecate

Why do some people use 'deprecated' to describe obso...



We ♥ the Verb 'Heart'

The history of 'heart' as a verb



Looking for Love

No, we can't tell you how long it lasts



Nouns That Look Like Adjectives

'Singles' is a noun. So is 'bar'. And yet.

ASK THE EDITORS



There, They're, Their

There, there. We'll sort it out.



The Awkward Case of 'His or Her'

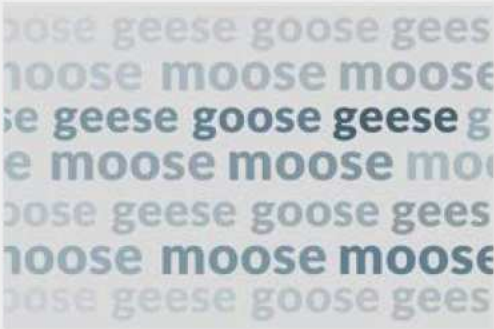
Singular 'their' might be a better

choice



Irregardless

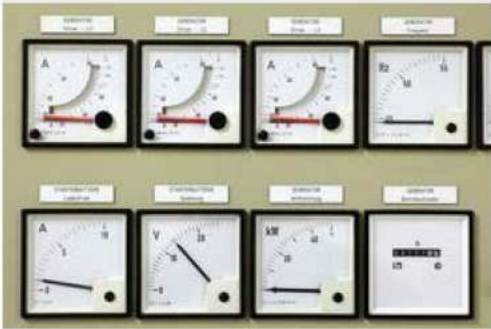
It is in fact a real word (but that doesn't mean you should use it).



Weird Plurals

One goose, two geese. One moose, two... moose. What's up with that?

WORD GAMES



Obscure Units of Measurement Quiz

Do you know these uncommon units of measurement? Learn more...

TAKE THE QUIZ >



Name That Thing

Test your visual vocabulary with our 10-question challenge!

TAKE THE QUIZ >



Word Winder's CrossWinder

A game of winding words.



Words of Snow and Ice Quiz

A selection of words from the chillier

parts of the lexicon

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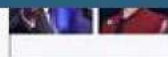
EXHIBIT 5



SINCE 1828

MENU

innovation



2016 presidential campaign

LEARN
VOCABULARY?

to find

innovation

noun | in·no·va·tion | \,i-nə-'vā-shən\

Simple Definition of INNOVATION

Popularity: Top 1% of lookups

: a new idea, device, or method

: the act or process of introducing new ideas, devices, or methods

WORD OF THE DAY

FEBRUARY 17, 2016

nimrod

a hunter or an idiot or jerk

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Full Definition of INNOVATION

- 1 : the introduction of something new
- 2 : a new idea, method, or device : **NOVELTY**

—in·no·va·tion·al \-shnəl, -shə-nəl\ adjective



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BROWSE DICTIONARY

See **innovation** defined for English-language learners

See **innovation** defined for kids

Related Content



2014 Word of the Year:
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Examples of INNOVATION

She is responsible for many *innovations* in her field.

the latest *innovation* in computer technology

Through technology and *innovation*, they found ways to get better results with less work.

the rapid pace of technological *innovation*



First Known Use of INNOVATION

15th century

innocence

innocency

innocent

innocent converter

innocent conveyance



SHOP NOW

TRENDING NOW

1 Evitable

When 'inevitable' isn't

2 Malleable

Lookups for the word spiked after Ca...

3 Litmus Test

Once a chemistry term, now used inc...

4 Amnesty

Everyone's looking for 'amnesty'. Again.

5 Mano a Mano

Cruz challenged Trump to a 1-on-1 d...

Century

Related to INNOVATION

Synonyms

brainchild, coinage,
concoction,  rinance,
creation invention wrinkle

Rhymes with INNOVATION

abdication, aberration,
abjuration, abnegation,
abrogation,  ptation,
acclamation accusation

INNOVATION Defined for Kids

innovation 

noun | in·no·va·tion | \,i-nə-'vā-shən\

Definition of INNOVATION

- 1 : a new idea, method, or device : **NOVELTY** <The company's latest *innovation* is a talking car.>
- 2 : the introduction of something new <Consumers are looking for *innovation*.>

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WORD GAMES

Take a 3-minute break and test your skills!



How much does a *batman* (the Turkish unit of measurement) weigh?

100 pounds

16.96 pou...

2.2 pounds

196.5 pou...

N A M E
T H A T
T H I N G

10 quick questions: hear them, spell them, and see how your skills compare to the crowd.

TAKE THE QUIZ >



Test Your Knowledge - and learn some interesting things along the way.

TAKE THE QUIZ >

Learn More about INNOVATION

- Thesaurus: [All synonyms and antonyms for "innovation"](#)
- Spanish Central: [Translation of "innovation"](#)
- Nglish: [Translation of "innovation" for Spanish speakers](#)
- Britannica English: [Translation of "innovation" for Arabic speakers](#)
- Britannica.com: [Encyclopedia article about "innovation"](#)

Seen and Heard

What made you want to look up *innovat* where you read or heard it (including the possible).

68 Comments



Odonokuma Michael Frcs · Sound Editor at Vividmagic Entertainment

Innovation and invention are two words classification. Much of the confusion arises in the business world to redefine the two to a businessman sees innovation as new ideas, new facilities that yield profit to the business. It might sound correct, it overshadows the ideas are equally important though they lack business value. The INNOVATION we have novel ideas, they got a lot to do with making where non-business people like myself entirely new word or a completely different

Like · Reply · Oct 29, 2015 4:37am

Carlos Roche · Founder & CEO



Odonokuma, you define "innov perspective for the non business need a broader definition, what applicabilities to different areas that replaces the old applies even passes and we get comfortable perspective is in order in most cases parenting, energy consumption, the Nigerian Government, etc etc

Like · Reply · 1 · Jan 4, 2016 9:42



Odonokuma Michael Frs · S
Video Editor at Vividmagic Enterprise
Carlos Roche, thank you for a v

WORDS AT PLAY



Deprecate

Why do some people use 'deprecated' to describe obsolete ...



We ♥ the Verb 'Heart'

The history of 'heart' as a verb



Looking for Love

No, we can't tell you how long it lasts



Nouns That Look Like Adjectives

'Singles' is a noun. So is 'bar'. And

yet.

ASK THE EDITORS



There, They're, Their

There, there. We'll sort it out.



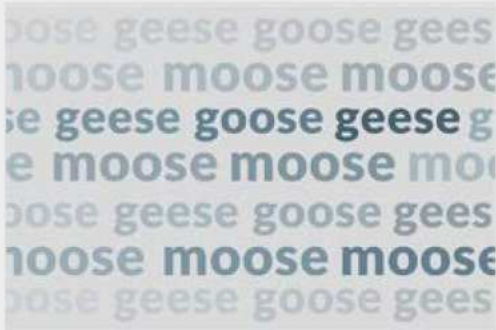
The Awkward Case of 'His or Her'

Singular 'their' might be a better choice



Irregardless

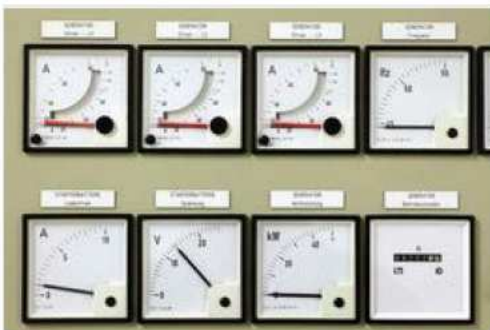
It is in fact a real word (but that doesn't mean you should use it).



Weird Plurals

One goose, two geese. One moose, two... moose. What's up with that?

WORD GAMES



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EXHIBIT 6

NICOLE DEXTER
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposition No. 91215896

Bell's Brewery, Inc.,
Opposer,

vs.

Innovation Brewing,
Applicant.

C O N F I D E N T I A L

30(b)(6) DEPOSITION OF INNOVATION BREWING
through NICOLE DEXTER
(Taken by the Opposer)
Asheville, South Carolina
Thursday, March 19, 2015

Reporter: April Reid

Job No: 91573

NICOLE DEXTER

ANNOUNCEMENT PAGE

Thursday, March 19, 2015

12:24 p.m.

Country Inn & Suites by Carlson

Meeting Room

1914 Old Haywood Road

Asheville, North Carolina

Reported in Stenotype by April Reid

1 NICOLE DEXTER

2 APPEARANCES

3 DORSEY & WHITNEY

On behalf of Opposer

4 51 West 52nd Street

New York, NY 10019

5 BY: SUSAN PROGOTT, ESQUIRE

and

6 HUESCHEN and SAGE

On behalf of Opposer

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9 REISER LEGAL

10 On behalf of Applicant

93 South Jackson Street

11 Seattle, WA 98104

BY: DOUGLAS REISER, ESQUIRE

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NICOLE DEXTER

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Q. So are you saying that your recipes for beer were not innovative? Is that your testimony?

A. I really don't think our beer stands apart from anybody else's beer in the country.

Q. So it's just like everyone else's beer? Nothing special about it?

A. I think it's really good, but I don't think it's different than anybody's.

Q. It is just ordinary beer, right?

A. Right.

NICOLE DEXTER

(THEREUPON, the deposition of NICOLE
DEXTER was adjourned at 4:11 p.m.)

Nicole Dexter

NICOLE DEXTER

Subscribed and sworn to before
this 15th day of April, 2015
Elaine F McFalls
NOTARY PUBLIC
Elaine F McFalls
4-25-2017



1
2 STATE OF NORTH CAROLINA

3 COUNTY OF MECKLENBURG

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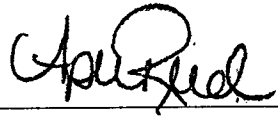
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EXHIBIT 7

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NICOLE DEXTER

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Q. When did your company open its doors to

1 NICOLE DEXTER

2 do business?

3 A. October 18, 2013.

4 Q. And what was the first thing that it
5 did once it opened its doors? Were you offering any
6 products?

7 A. Yeah.

8 Q. Which ones?

9 A. Beer, merchandise, growlers,
10 sunglasses.

11 Q. When you say "merchandise," what do you
12 mean?

13 A. Like T-shirts and apparel, things like
14 that.

15 Q. Anything else?

16 A. I believe we had koozies.
17 That's all I can think of.

18 Q. And did those materials have any
19 markings or designs on them?

20 A. What do you mean? Like --

21 Q. Did they have a name on them --

22 A. Yes.

23 Q. -- or were they just generic, blank
24 T-shirts?

25 A. No. They had "Innovation Brewing" on

NICOLE DEXTER

it.

NICOLE DEXTER

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Nicole Dexter

NICOLE DEXTER

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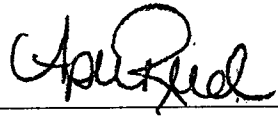
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1 NICOLE DEXTER

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18 Q. Okay. And is this the -- the type of
19 tap handle that is used at your bar?

20 A. No. That was a tap handle that's used
21 at other people's bar that carries our beer.

22 Q. How many of these have you distributed
23 to other bars?

24 A. Probably around -- I don't know -- 15.

25 Q. And are the bars that you've

1 NICOLE DEXTER

2 distributed these tap handles to local?

3 A. What do you define as "local"?

4 Q. Well, close -- close by you or in the
5 town or surrounding towns where your brewery is
6 located.

7 A. Yes. Some are in Asheville, and the
8 rest are around the Sylva area, Jackson County area.

9 Q. Are they all in North Carolina?

10 A. Yes.

11 Q. And when did you begin distributing tap
12 handles?

13 A. Whenever we began distributing beer,
14 which was, say, sometime later 2014.

15 Q. When you say sometime later --

16 A. Like in the last quarter maybe or
17 somewhere around there. I can't remember exactly
18 when we began distribution.

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NICOLE DEXTER

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Nicole Dexter

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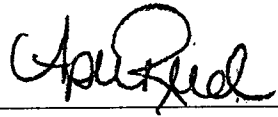
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1 NICOLE DEXTER

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16 Q. And have you -- have you shipped kegs
17 of beer to anyone outside of North Carolina?

18 A. We haven't shipped kegs. We've done,
19 like, a beer festival outside of North Carolina.
20 We've brought the kegs there. I'm not sure if
21 that's what you're referring to.

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NICOLE DEXTER

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NICOLE DEXTER

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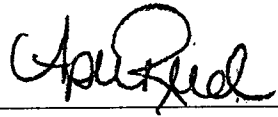
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NICOLE DEXTER

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Q. And have you made any shipments to somebody in another state?

A. Of T-shirt, I have; but not of beer.

Q. When did you ship a T-shirt out of state?

A. I'm not sure exactly when. Sometime last year, in Pennsylvania.

Q. And was this a single T-shirt?

A. It was.

Q. And have you made any other shipments out of state of T-shirts?

A. I don't believe so.

NICOLE DEXTER

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DEXTER was adjourned at 4:11 p.m.)

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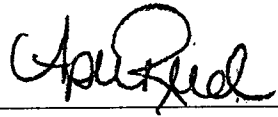
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On behalf of Opposer

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Kalamazoo, MI 49007

8 BY: JOANNA FRENCH, ESQUIRE

9 REISER LEGAL

10 On behalf of Applicant

93 South Jackson Street

11 Seattle, WA 98104

BY: DOUGLAS REISER, ESQUIRE

1 NICOLE DEXTER

2 THEREUPON:

3 NICOLE DEXTER

4 was called as a witness and, after having been first
5 duly sworn, was examined and testified upon her oath
6 as follows:

7

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NICOLE DEXTER

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Q. Are there any places where you sell
your merchandise other than the brewpub?

A. No.

NICOLE DEXTER

(THEREUPON, the deposition of NICOLE
DEXTER was adjourned at 4:11 p.m.)

Nicole Dexter

NICOLE DEXTER

Subscribed and sworn to before
this 15th day of April, 2015
Elaine F McFalls
NOTARY PUBLIC
Elaine F McFalls
4-25-2017



1
2 STATE OF NORTH CAROLINA

3 COUNTY OF MECKLENBURG

4 I, April Reid, RPR, CRR, CLR, in and for
5 the State of North Carolina, do hereby certify that
6 I reported the above-referenced deposition, the
7 deposition has been reduced to typewriting under my
8 direction, and the deposition is a true record of
9 same. I further certify that I am neither attorney
10 or counsel for, nor related to or employed by, any
11 attorney or counsel employed by the parties hereto
12 or financially interested in this action.

13 This, the 20th day of March, 2015.

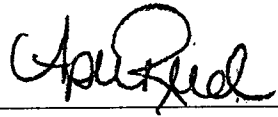
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17 APRIL REID, RPR, CRR, CLR
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EXHIBIT 12

NICOLE DEXTER
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposition No. 91215896

Bell's Brewery, Inc.,
Opposer,

vs.

Innovation Brewing,
Applicant.

C O N F I D E N T I A L

30(b)(6) DEPOSITION OF INNOVATION BREWING
through NICOLE DEXTER
(Taken by the Opposer)
Asheville, South Carolina
Thursday, March 19, 2015

Reporter: April Reid

Job No: 91573

NICOLE DEXTER

ANNOUNCEMENT PAGE

Thursday, March 19, 2015

12:24 p.m.

Country Inn & Suites by Carlson

Meeting Room

1914 Old Haywood Road

Asheville, North Carolina

Reported in Stenotype by April Reid

1 NICOLE DEXTER

2 APPEARANCES

3 DORSEY & WHITNEY

On behalf of Opposer

4 51 West 52nd Street

New York, NY 10019

5 BY: SUSAN PROGOTT, ESQUIRE

and

6 HUESCHEN and SAGE

On behalf of Opposer

7 107 West Michigan Avenue

Kalamazoo, MI 49007

8 BY: JOANNA FRENCH, ESQUIRE

9 REISER LEGAL

10 On behalf of Applicant

93 South Jackson Street

11 Seattle, WA 98104

BY: DOUGLAS REISER, ESQUIRE

1 NICOLE DEXTER

2 THEREUPON:

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5 duly sworn, was examined and testified upon her oath
6 as follows:

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NICOLE DEXTER

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24 Q. Before we get to that, though, I would
25 just like to ask you: For the three invoices that

1 NICOLE DEXTER

2 we've looked at, how were each of those products
3 labeled?

4 A. With a keg collar. Is that what you're
5 asking?

6 Q. Yes, if that's what they were.

7 A. Yes.

8 Q. And what does the keg collar say?

9 A. It has our business name, address, what
10 product is in the keg, what amount is in the keg,
11 and there's a Innovation Brewing sticker wrapped
12 around the keg as well.

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NICOLE DEXTER

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Nicole Dexter

NICOLE DEXTER

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this 15th day of April, 2015
Elaine F McFalls
NOTARY PUBLIC
Elaine F McFalls
4-25-2017



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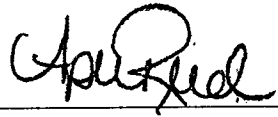
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EXHIBIT 13

NICOLE DEXTER
IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposition No. 91215896

Bell's Brewery, Inc.,
Opposer,

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9 REISER LEGAL

10 On behalf of Applicant

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NICOLE DEXTER

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19 Q. How many wholesale keg accounts do you
20 have?

21 A. I don't know. I'd have to count them
22 up.

23 But I'd say -- how many accounts? I'd
24 say around 15.

25 Q. And where are those accounts located?

1 NICOLE DEXTER

2 A. Some in Asheville and the rest in
3 Jackson County.

4 Q. So they're all in North Carolina; is
5 that correct?

6 A. For now, yes.

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NICOLE DEXTER

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Nicole Dexter

NICOLE DEXTER

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this 15th day of April, 2015
Elaine F McFalls
NOTARY PUBLIC
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4-25-2017



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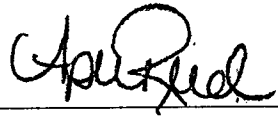
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EXHIBIT 14

NICOLE DEXTER

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposition No. 91215896

Bell's Brewery, Inc.,

Opposer,

vs.

Innovation Brewing,

Applicant.

C O N F I D E N T I A L

CONTINUED 30(b)(6) DEPOSITION OF NICOLE DEXTER

(Taken by the Opposer)

Asheville, North Carolina

Friday, March 20, 2015

Reported in Stenotype by April Reid

Job No. 91574

1 NICOLE DEXTER

2 ANNOUNCEMENT PAGE

3 Friday, March 20, 2015

4 Country Inn & Suites by Carlson

5 1914 Old Haywood Road

Asheville, North Carolina

6 Reported in Stenotype by April Reid

1 NICOLE DEXTER

2 APPEARANCES

3 DORSEY & WHITNEY

On behalf of Opposer

4 51 West 52nd Street

New York, New York 10019

5 BY: SUSAN PROGOTT, ESQUIRE

and

6 HUESCHEN & SAGE

On behalf of Opposer

7 107 West Michigan Avenue

8 Kalamazoo, Michigan 49007

BY: JOANNA FRENCH, ESQUIRE

9 REISER LEGAL

10 On behalf of Applicant

93 South Jackson Street

11 Seattle, Washington 98104

BY: DOUGLAS REISER, ESQUIRE

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NICOLE DEXTER

THEREUPON:

NICOLE DEXTER

was called as a witness and, after having been
previously sworn, was examined and testified upon
her oath as follows:

1 NICOLE DEXTER

2 Q. Okay. And what have been your volume
3 of wholesale sales?

4 A. I looked it up last night. We've sold
5 around 100 sixth-barrels and around 8 half-barrels.

6 Q. Over what period of time?

7 A. Between September 2nd and now.
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NICOLE DEXTER

(THEREUPON, the deposition of NICOLE
DEXTER was concluded at 11:24 a.m.)

Nicole Dexter
NICOLE DEXTER

DATED this 15 day of April, 2015,
at Sylva NC,

1
2 STATE OF NORTH CAROLINA

3 COUNTY OF MECKLENBURG

4 I, April Reid, RPR, CRR, CLR, in and for
5 the State of North Carolina, do hereby certify that
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9 same. I further certify that I am neither attorney
10 or counsel for, nor related to or employed by, any
11 attorney or counsel employed by the parties hereto
12 or financially interested in this action.

13 This, the 23rd day of March, 2015.

14
15 
16

17 APRIL REID, RPR, CRR, CLR
18
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EXHIBIT 15

NICOLE DEXTER

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposition No. 91215896

Bell's Brewery, Inc.,

Opposer,

vs.

Innovation Brewing,

Applicant.

C O N F I D E N T I A L

CONTINUED 30(b)(6) DEPOSITION OF NICOLE DEXTER

(Taken by the Opposer)

Asheville, North Carolina

Friday, March 20, 2015

Reported in Stenotype by April Reid

Job No. 91574

1 NICOLE DEXTER

2 ANNOUNCEMENT PAGE

3 Friday, March 20, 2015

4 Country Inn & Suites by Carlson

5 1914 Old Haywood Road

Asheville, North Carolina

6 Reported in Stenotype by April Reid

1 NICOLE DEXTER

2 APPEARANCES

3 DORSEY & WHITNEY

On behalf of Opposer

4 51 West 52nd Street

New York, New York 10019

5 BY: SUSAN PROGOTT, ESQUIRE

and

6 HUESCHEN & SAGE

On behalf of Opposer

7 107 West Michigan Avenue

8 Kalamazoo, Michigan 49007

BY: JOANNA FRENCH, ESQUIRE

9 REISER LEGAL

10 On behalf of Applicant

93 South Jackson Street

11 Seattle, Washington 98104

BY: DOUGLAS REISER, ESQUIRE

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NICOLE DEXTER

THEREUPON:

NICOLE DEXTER

was called as a witness and, after having been
previously sworn, was examined and testified upon
her oath as follows:

NICOLE DEXTER

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10 Q. Who's Burial Beer?

11 A. A brewery in Asheville.

12 Q. And did they buy from you?

13 A. They have.

14 Q. Are they continuing to?

15 A. Yes. They host an annual festival
16 every year that we'll be participating in.

17 Q. Have you participated in their
18 festivals in the past?

19 A. Yes.

20 Q. Which one -- which ones did you
21 participate in?

22 A. I don't remember the name of the
23 festival, but it's -- I think we did -- I think we
24 gave them a pumpkin.

25 Q. You gave them a pumpkin?

1 NICOLE DEXTER

2 A. Pumpkin beer.

3 Q. All right.

4 A. There you go. That's me with a
5 pumpkin.

6 Q. Were you personally at the festival?

7 A. No.

8 Q. So tell me how it worked. What
9 happened?

10 A. We wholesale a keg to them, and they
11 sell it.

12 Q. Is this free samples or --

13 A. No.

14 Q. -- they sell it?

15 A. They sell it.

16 Q. Was there any advertising or marketing
17 materials that you gave them along with the keg?

18 A. I don't believe so.

19 Q. Was the keg marked so that people would
20 know it was your beer?

21 A. Yes.

22 Q. And when was this festival?

23 A. I really don't remember.

24 Q. Have you participated in any other
25 festivals?

1 NICOLE DEXTER

2 A. Yes.

3 Q. How many?

4 A. Maybe around three.

5 Q. Which ones?

6 A. The Community Tap in South Carolina.

7 What other festivals have we done? Oh,

8 Sierra Nevada's Beer Camp Festival.

9 Q. Where is that?

10 A. At their Mills River location here in
11 North Carolina.

12 Q. When was that?

13 A. In August of last year.

14 Q. And when was the other one that you
15 just mentioned?

16 A. I think it was maybe May of last year.
17 I don't really recall for sure.

18 Q. 2014?

19 A. Yes.

20 Q. And the third one?

21 A. Brewgrass.

22 Q. And when was that?

23 A. That was September of last year, I
24 believe.

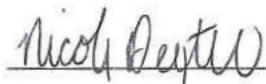
25 Q. And where was that one?

NICOLE DEXTER

A. In Asheville.

NICOLE DEXTER

(THEREUPON, the deposition of NICOLE
DEXTER was concluded at 11:24 a.m.)

_____

NICOLE DEXTER

DATED this 15 day of April, 2015,
at Sylva NC,

1
2 STATE OF NORTH CAROLINA

3 COUNTY OF MECKLENBURG

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14
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17 APRIL REID, RPR, CRR, CLR
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EXHIBIT 16

NICOLE DEXTER

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Opposition No. 91215896

Bell's Brewery, Inc.,

Opposer,

vs.

Innovation Brewing,

Applicant.

C O N F I D E N T I A L

CONTINUED 30(b)(6) DEPOSITION OF NICOLE DEXTER

(Taken by the Opposer)

Asheville, North Carolina

Friday, March 20, 2015

Reported in Stenotype by April Reid

Job No. 91574

1 NICOLE DEXTER

2 ANNOUNCEMENT PAGE

3 Friday, March 20, 2015

4 Country Inn & Suites by Carlson

5 1914 Old Haywood Road

Asheville, North Carolina

6 Reported in Stenotype by April Reid

1 NICOLE DEXTER

2 APPEARANCES

3 DORSEY & WHITNEY

On behalf of Opposer

4 51 West 52nd Street

New York, New York 10019

5 BY: SUSAN PROGOTT, ESQUIRE

and

6 HUESCHEN & SAGE

On behalf of Opposer

7 107 West Michigan Avenue

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BY: JOANNA FRENCH, ESQUIRE

9 REISER LEGAL

10 On behalf of Applicant

93 South Jackson Street

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BY: DOUGLAS REISER, ESQUIRE

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NICOLE DEXTER

THEREUPON:

NICOLE DEXTER

was called as a witness and, after having been
previously sworn, was examined and testified upon
her oath as follows:

NICOLE DEXTER

Q. The business plan describes your targeted customers as anyone over the age of 21. Is that accurate?

A. I believe so.

NICOLE DEXTER

(THEREUPON, the deposition of NICOLE
DEXTER was concluded at 11:24 a.m.)

Nicole Dexter

NICOLE DEXTER

DATED this 15 day of April, 2015,
at Sylva NC,

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EXHIBIT 17

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2 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

3 Opposition No. 91215896

4
5 Bell's Brewery, Inc.,

6 Opposer,

7 vs.

8 Innovation Brewing,

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10 _____

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12 C O N F I D E N T I A L

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14 (Taken by the Opposer)

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THEREUPON:

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previously sworn, was examined and testified upon
her oath as follows:

1 NICOLE DEXTER

2
3 Q. Okay. Did you file your original
4 trademark application -- well, let me say this
5 first.

6 The original trademark application that
7 was filed in 2013, I am going to refer to it as the
8 mark. Is everybody okay with that?

9 MS. FRENCH: Uh-huh.

10 MR. REISER: This is the 2013 filing.

11 BY MR. REISER:

12 Q. Did you file the mark application
13 because you wanted to provide notice to other
14 potential users?

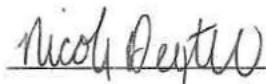
15 A. Yes.

16 Q. Did you file that mark application
17 because you wanted to obtain nationwide enforcement
18 rights?

19 A. Yes.

NICOLE DEXTER

(THEREUPON, the deposition of NICOLE
DEXTER was concluded at 11:24 a.m.)

_____

NICOLE DEXTER

DATED this 15 day of April, 2015,
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EXHIBIT 18

1 NICOLE DEXTER

2 IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

3 Opposition No. 91215896

4
5 Bell's Brewery, Inc.,

6 Opposer,

7 vs.

8 Innovation Brewing,

9 Applicant.

10 _____

11
12 C O N F I D E N T I A L

13 CONTINUED 30(b)(6) DEPOSITION OF NICOLE DEXTER

14 (Taken by the Opposer)

15 Asheville, North Carolina

16 Friday, March 20, 2015

17 Reported in Stenotype by April Reid

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1 NICOLE DEXTER

2 ANNOUNCEMENT PAGE

3 Friday, March 20, 2015

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NICOLE DEXTER

THEREUPON:

NICOLE DEXTER

was called as a witness and, after having been
previously sworn, was examined and testified upon
her oath as follows:

1 NICOLE DEXTER

2

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10 Q. When you decided to open a brewery, did
11 you plan to sell your beer to a larger region?

12 A. Yes.

13 Q. Does your -- I am going to refer back
14 to Exhibit 31 really quickly, which is the business
15 plan, which conveniently was just introduced.

16 Do you have that still in front of you?

17 A. Yes.

18 Q. Go to page 11.

19 A. Okay.

20 Q. There's a -- there's a small paragraph
21 there called "Distribution."

22 A. Yes.

23 Q. This paragraph was in your earliest
24 forms of your business plan, correct?

25 A. Yes.

1 NICOLE DEXTER

2 Q. Okay. Does this paragraph -- I mean,
3 you can read it. Go ahead and read it for the
4 record, actually.

5 A. Okay.

6 Q. Why don't we do that.

7 A. Oh, out loud?

8 Q. Yeah.

9 A. "Initially all of our beer was sold on
10 premise either by the pint or to go in half-gallon
11 growlers. As demand grows and production increases,
12 we will sell kegs to other establishments. And as a
13 result of our growth, we have recently" -- this is
14 horrible grammar -- "recently started keg
15 distribution for six various locations, five in
16 Jackson County and one in Asheville. As production
17 continues to increase, we will expand our
18 distribution accordingly, as we have been approached
19 to supply various other establishments."

20 Q. In reference to that last sentence, "as
21 production continues to increase, we will expand our
22 distribution accordingly, as we have been approached
23 to supply various other establishments," have you
24 had that same plan in effect since you started your
25 brewery?

1 NICOLE DEXTER

2 A. Yes.

3 Q. Okay. And does that -- does that
4 insinuate -- let me phrase this a different way.

5 Does -- does that mean that you're
6 going to sell beer to a larger region?

7 A. Yes.

8 Q. Okay. And what do you define as your
9 region?

10 A. Mostly the Southeast. Southeastern
11 states: Georgia, South Carolina, Florida, North
12 Carolina, Tennessee.

13 Q. What is your incentive to sell to
14 states like that?

15 A. Well, we're geographically really close
16 to a few other states, a lot closer than we are to a
17 lot of North Carolina, so that's a big incentive.

18 Q. Have you already begun promoting your
19 beer in any of those states?

20 A. Yes.

21

22

23

24

25

NICOLE DEXTER

(THEREUPON, the deposition of NICOLE
DEXTER was concluded at 11:24 a.m.)

Nicole Dexter

NICOLE DEXTER

DATED this 15 day of April, 2015,
at Sylva NC,

1
2 STATE OF NORTH CAROLINA

3 COUNTY OF MECKLENBURG

4 I, April Reid, RPR, CRR, CLR, in and for
5 the State of North Carolina, do hereby certify that
6 I reported the above-referenced deposition, the
7 deposition has been reduced to typewriting under my
8 direction, and the deposition is a true record of
9 same. I further certify that I am neither attorney
10 or counsel for, nor related to or employed by, any
11 attorney or counsel employed by the parties hereto
12 or financially interested in this action.

13 This, the 23rd day of March, 2015.
14

15 
16

17 APRIL REID, RPR, CRR, CLR
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